

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

KATHRYN GAY

*Plaintiff*

v.

THE CHILDREN'S HOSPITAL OF  
PHILADELPHIA; ELENi LANTZOUNI;  
JENNIFER LOUIS-JACQUES; MICHELE  
ZUCKER; LEELA JACKSON; KATIE  
HOEVELER; MORTIMER PONCZ; AND  
ALAN R. COHEN

*Defendants*

)  
) **CIVIL ACTION**

)  
) **NO. 18-2880**

)  
) [ELECTRONICALLY FILED]

**PLAINTIFF'S MOTION FOR LEAVE AND**  
**MOTION *IN LIMINE* TO EXCLUDE THE EXPERT TESTIMONY**  
**OF DR. MICHAEL SPAULDING-BARCLAY**

Plaintiff, by and through her attorneys, hereby requests leave to file the instant motion and moves *in limine* to exclude the Report and expert testimony of Dr. Michael Spaulding-Barclay. In support of her position, Plaintiff files an accompanying memorandum setting forth Plaintiff's position in full.

Respectfully submitted,

Date: March 7, 2023

/s/ Alexander Keller\_\_\_\_\_

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*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 7, 2023, I electronically filed Plaintiff's Motion for Leave and Motion *In Limine* to Exclude The Expert Testimony of Dr. Michael Spaulding-Barclay and its supporting documents, which are available for viewing and downloading from the ECF system to the following:

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Date: March 7, 2023

/s/ Alexander Keller

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